

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

RUSTEM KAZAZI; LEJLA KAZAZI; and
ERALD KAZAZI,

Movants,

v.

U.S. CUSTOMS AND BORDER
PROTECTION; UNITED STATES OF
AMERICA; KEVIN McALEENAN,
Commissioner, U.S. Customs and Border
Protection, sued in his official capacity;
TIMOTHY STARK, agent of U.S. Customs
and Border Protection, sued in his individual
capacity; and UNKNOWN AGENTS OF U.S.
CUSTOMS AND BORDER PROTECTION,
sued in their individual capacities

Respondents.

Case No. 1:18-mc-51

Judge Dan Aaron Polster

**Movants' Motion for Admission Pro Hac
Vice of Wesley Hottot**

Pursuant to Rule 83.5(h) of the Local Rules of the United States District Court for the Northern District of Ohio, Plaintiffs/Movants Rustem Kazazi, Lejla Kazazi, and Erald Kazazi, by and through their undersigned counsel, hereby move this Court for the admission *pro hac vice* of Wesley Patrick Hottot, so that he may appear and participate in this case on their behalf.

Mr. Hottot is a member in good standing of the State Bar of Texas (admitted November 7, 2008, bar number 24036851), the Washington State Bar Association (admitted June 30, 2014, bar number 47539), the United States Supreme Court, United States Courts of Appeals of the Sixth, Eighth, and Ninth Circuits, and the United States District Courts for the Northern District of Texas, Western District of Texas, and Western District of Washington. A Certificate of Good Standing from the Supreme Court of the State of Texas is attached as **Exhibit 1**.

Mr. Hottot is not now, nor has he ever been disbarred or suspended from practice before any bar, court, department, bureau, or commission anywhere in the United States, nor has he ever received any reprimand from any such bar, court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar.

His contact information is:

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To the extent that good cause is required for admission *pro hac vice*, good cause exists. Mr. Hottot and the Institute for Justice have experience working on civil forfeiture cases, like this case, in which property owners have had relatively small sums of money seized from them. The Institute for Justice is a non-profit, public-interest law firm, which represents all of its clients *pro bono*. The Kazazis believe that they will benefit from the *pro bono* representation of Mr. Hottot and the Institute for Justice, as they work to navigate the complex procedural and substantive issues raised by this case. Of particular benefit to the Kazazis is the Institute for Justice's willingness to provide legal services for free, so that the value of the property at issue is not outstripped by the cost of litigating for its rightful return.

For the foregoing reasons, local counsel for the Kazazis respectfully requests that this Court enter an Order granting the admission *pro hac vice* of Wesley Patrick Hottot.

DATED this May 31, 2018.

Respectfully submitted,

/s/ Patrick T. Lewis

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/s/ Wesley Hottot

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*Attorneys for Movants, Rustem Kazazi, Lejla
Kazazi, & Erald Kazazi*

* Motion for admission *pro hac vice*
pending

CERTIFICATE OF SERVICE

I further certify that on this 31st day of May, 2018, I caused a copy of the foregoing Motion and the accompanying exhibit to be served on the Respondents by certified mail, return receipt requested, at the addresses identified below:

U.S. Customs and Border Protection
1300 Pennsylvania Ave. NW
Washington, DC 20229

U.S. Customs and Border Protection
c/o Attorney General Jefferson Sessions
U.S. Department of Justice
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